

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:)	
Georgia Power Company's 2022)	Docket No. 44160
Integrated Resource Plan)	

And

In Re:)	
Georgia Power Company's 2022 Application)	Docket No. 44161
for the Certification, Decertification, and)	
Amended Demand Side Management Plan)	

APPLICATION FOR LEAVE TO INTERVENE OF
GEORGIA COALITION OF LOCAL GOVERNMENTS

COMES NOW, the City of Atlanta, the City of Savannah, the City of Decatur, the Unified Government of Athens-Clarke County, the County of Fulton, and the County of DeKalb as the Georgia Coalition of Local Governments (hereafter "The Coalition"), pursuant to O.C.G.A. §§ 50-13-14 and 46-2-59 and Commission Rule 515-2-1-.06, and hereby files this Application for Leave to Intervene ("Application") in the above-referenced dockets. In support hereof, The Coalition respectfully shows as follows:

1.

On January 31, 2022, the Georgia Power Company (hereafter "Georgia Power") filed for approval of its 2022 Integrated Resource Plan (hereafter "IRP") including a request to decertify certain generating units, as well as for certification of both renewable and non-renewable capacity additions. On January 31, 2022, Georgia Power also filed an application for the

certification of its amended demand side management (hereafter “DSM”) plan, including a request to certify one (1) new residential program, decertify two (2) residential and commercial programs, and continue the certification of ten (10) residential and commercial programs. Pursuant to that filing, The Coalition files this application for leave to intervene and participate in these dockets. The application is timely filed.

2.

The six city and county governments that comprise The Georgia Coalition of Local Governments represent jurisdictions partially or wholly served by Georgia Power. The Coalition member governments collectively represent nearly 2.1 million residents, or roughly 20% of the state population, and more than 31 million MWh of community electricity use. Moreover, the member governments are large buyers of electricity, purchasing more than 930,000 MWh for their local operations each year. As both large buyers and representatives of our citizens, the coalition members are particularly interested in issues of energy affordability, alleviation of energy burdens, and robust demand-side management or energy efficiency programs that will be affected by the IRP process. Moreover, each of the participating governments has articulated a desire to transition operations away from the use of fossil fuels to clean and renewable forms of energy to reduce carbon emissions and improve reliability and resiliency. Additionally, the Coalition recognizes that you cannot manage what is not measured and values data access, transparency, and accountability to report on energy and environmental sustainability goals. None of the members of this coalition has ever intervened in an IRP proceeding. In order to do so, the coalition has had to go through timely, appropriate local government processes to receive the official approval to move forward.

3.

As required in the Application Requirements adopted by the PSC in the Procedural Schedule Order (PSO), The Coalition has reviewed the other intervening party applications including applications by Interstate Gas Supply, Inc., Sierra Club, Southern Renewable Energy Association, Georgia Watch, The Commercial Group, Georgia Interfaith Power and Light and Partnership for Southern Equity joint application, Concerned Ratepayers of Georgia, Resource Supply Management, Southern Alliance for Clean Energy and Southface joint application, and the Georgia Association of Manufacturers. The Coalition's rights and interests cannot be adequately represented by any other party to the above-styled dockets, and its participation in this matter will not unduly delay these proceedings or prejudice any other party.

4.

The Coalition respectfully requests that it be granted leave to intervene and participate fully as a party in these proceedings, including the right to present testimony and exhibits, cross-examine witnesses, and file briefs.

5.

The Coalition respectfully requests that the following persons receive all notices, correspondence, pleadings, and copies of orders and other materials in these dockets, and that all communications regarding these dockets be directed to them:

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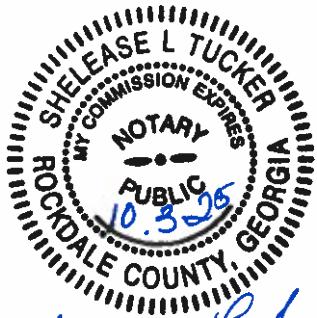
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WHEREFORE, the Coalition respectfully requests that the Commission grant its application for leave to intervene and admit it as a full party of record in these proceedings with all right attendant thereto.

Respectfully submitted this 14th day of March, 2022



Shelease L. Tucker

John R. Seydel
City of Atlanta Office of Resilience
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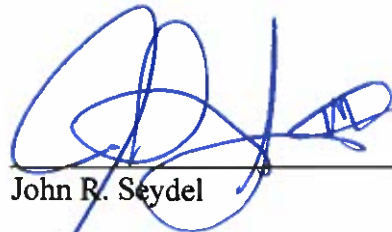
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VERIFICATION OF APPLICATION FOR LEAVE TO INTERVENE

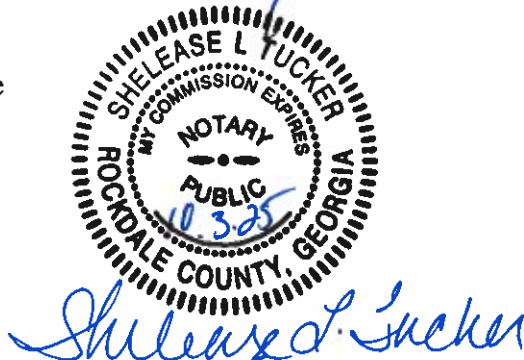
Personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County aforesaid, John R. Seydel authorized by the Georgia Coalition of Local Governments to exercise this verification on its behalf and that the facts contained in the foregoing Joint Application for Leave to Intervene are true and correct to the best of her information and belief.

This 14th day of March, 2022



John R. Seydel

Sworn to and subscribed before me
this 14th day of March 2022.



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CERTIFICATE OF SERVICE

I do hereby certify that I have this 14th day of March, 2022, served the following parties with the foregoing **APPLICATION FOR LEAVE TO INTERVENE OF THE GEORGIA COALITION OF LOCAL GOVERNMENTS**, by electronic mail.

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